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ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

AZ CORP COMMISSION

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Commissioner

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Generic Investigation on Industry)
Petition for Approval of an NPA Relief)
Plan for the 520 NPA.)

T-00000F-99-0641

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WorldCom, Inc. ("WCom") submits the following comments regarding NPA relief for the 520 area code.

AREA CODE RELIEF

WCom generally advocates geographic splits as the most pro-competitive method for area code relief. First, a geographic split is the most widely accepted method of NPA relief and is preferred by most residential and business consumers, in part, because it does not require mandatory 10-digit dialing for all local calls. Second, a geographic split is also competitively neutral in that it does not introduce infirmities to the development of an effectively competitive local telecommunications market. There are, however, certain circumstances where a geographic split may not be an appropriate method of area code relief, particularly when a geographic split may result in the splitting of an ILEC rate center, may track municipal boundaries, or where such a split may not promote number conservation.

Unfortunately, some end users will suffer some cost and disruption under either a split or an overlay alternative, although the degree to which end users are negatively affected differs based on the alternative selected. The impact of an overlay on end users

includes: 1) loss of all 7-digit local dialing; 2) loss of the ability to associate an area code with a unique geographic area; 3) confusion resulting from different area codes assigned in the same home, business or neighborhood; 4) cost to customers throughout the overlay area that currently use their 7-digit number for advertising, stationery changes, and for new materials with the 10-digit number; 5) cost to customers throughout the overlay area to reprogram or replace automatic dialing systems including home alarm and apartment security systems, and elevator emergency phones that are currently programmed for 7-digits; and 6) replacement or upgrades to old PBX systems that may not be able to support mandatory 10-digit dialing.

The impact of an area code split on end users includes: 1) the need for customers in a portion of the existing area code to change their area code; 2) there may be a need for some additional 10-digit dialing for calling between the old and new area codes; and 3) the cost to customers in the new area code to show the new area code on letterhead, stationary, and advertising.

Further an overlay plan can significantly frustrate entry by competitors into the local exchange market, and provide the incumbent Local Exchange Carrier ("ILEC"), in this case, U S WEST, with a competitive advantage. An overlay plan creates two NPAs in the same area (the current NPA and the "new" NPA covering the same geographic area). Customers are familiar with the current NPA and associate that NPA with a specific area. If an overlay is implemented, the new NPA will not be as desirable to customers because it is unfamiliar, particularly immediately following the creation of the new code.

Currently, the vast majority of the more desirable NXXs in the current area code have already been assigned to U S WEST. If an overlay plan is implemented, competitive local exchange companies ("CLECs"), as they move into new competitive markets in Arizona, are left to draw NXXs primarily from the new, overlay NPA and have less access to the more desirable NXXs in the current area code. This system of NXX "have" and "have-nots" is extremely anti-competitive, since it disproportionately affects CLECs as they are attempting to enter the local exchange market.

The disparity between the "current" and the "new" NPAs created under an overlay plan also extends to the market for new customers and existing customers who want to add new lines. An individual or business ordering new service, when faced with a choice between a telephone number in the "current", familiar NPA, and a number in the "new", unfamiliar NPA, which is geographically associated with "nowhere" in the present public psyche, will likely choose the number in the familiar area code.

Geographic splits are competitively neutral because both carriers and customers will ubiquitously experience the change. A geographic split will still create a new code with which both carriers and customers will need to become familiar. While an overlay plan exiles CLEC's to the new, less desirable area code, a geographic split affects all carriers equally. Under a geographic split, there is no additional incentive to select the ILEC over a competing carrier, either for new service or for additional lines within the same business or residence because both CLECs and ILECs will have equal access to numbers in the appropriate area code.

Another issue that should be considered is the impact upon number conservation. If an overlay is chosen, each CLEC wishing to stay competitive in the same given

“footprint” would need to acquire one new block of 10 thousand numbers for each NPA that is overlayed in the same geographic area for 911 trunking, regardless of whether that CLEC needs that additional block of 10 thousand numbers. When a competitive carrier enters the market, an NXX is assigned for each rate center, and trunking is needed to route calls to the appropriate public safety answering points (“PSAPs”). These numbers can then be ported within the rate center through permanent Local Number Portability. If the CLEC wishes to port a number from another service provider (“SP”) who has been assigned an NXX code from the “new” NPA from the overlay, that CLEC would have to acquire a block of 10 thousand numbers to secure trunking to the appropriate PSAP. The 911 system is designed to forward the telephone number of the calling party to a 911 router where the system determines to which 911 emergency center the call is routed. The information sent to the 911 router to identify the calling party consists of the seven digit telephone number (NXX-XXX) and another digit that is added to identify the NPA of the originating line.

If a split is chosen, the CLEC need only have appropriate 911 trunking to serve the NPA for which its “footprint” covers. There is no need to acquire an additional block of 10 thousand numbers for the sole purpose of routing 911 calls.

WCom does not support the industry recommendation of an overlay as the appropriate area code relief alternative. WCom believes this is a very large geographic area and would unnecessarily force rural areas into premature mandatory 10-digit local dialing. Many small businesses in the rural areas would be forced to upgrade equipment to accommodate mandatory 10-digit local dialing. These are costs that could be avoided for many years if the Commission considers these as negative impacts associated with an

overlay. Generally, SPs anticipate some costs associated with area code relief, however an overlay has higher societal costs than does an area code split.

WCom encourages the ACC to consider all these impacts and choose an area code split as the appropriate method of area code relief for NPA 520. During the industry planning meetings hosted by NeuStar, the North American Numbering Plan Administrator ("NANPA"), MCI WorldCom, nka WCom, supported without reservation "Alternative 2 - Two-way Split" filed by NeuStar, the NANPA on November 8, 1999.

NUMBER POOLING

In addition to commenting on the industry relief plan, the Commission requests parties to also address whether adoption of number pooling, as defined in the Federal Communication Commission's Order on Number Resource Optimization (CC Docket No. 99-200) the "NRO Order", be incorporated into the industry recommended relief plan.

WCom does not support the inclusion of number pooling as defined in the NRO Order into the recommended relief plan for NPA 520. The FCC in the NRO Order adopted thousands-block number pooling as a mandatory nationwide numbering resource optimization strategy. Although it set forth the national pooling framework in this Report and Order, it intends to offer thousands-block number pooling at the national level only after it has selected a national pooling administrator.

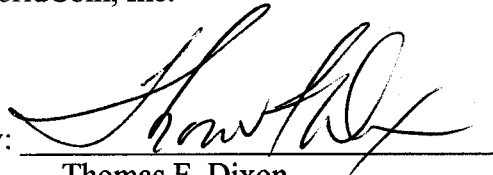
However, if the ACC receives advance authorization from the FCC on its petition for number pooling, the ACC should open a separate docket to deal with pooling issues, which addresses such matters as the naming of an interim pooling administrator, establishes an implementation schedule, and addresses cost recovery, for example.

In conclusion, WCom encourages the ACC to adopt Alternative 2 – A Two-way Split as the appropriate means for area code relief for NPA 520 and suggests that the ACC not address number pooling in this docket.

Dated: June 28, 2000

WorldCom, Inc.

By:

A handwritten signature in black ink, appearing to read "Tom Dixon", written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June, 2000, the original and 10 copies of WorldCom, Inc.'s comment in Docket No. T-00000F-99-0641 were sent via Airborne Express to the Arizona Corporation Commission. In addition a true and correct copy was sent via United States Mail to the following:

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